

Mr. Craig Hodgson  
New Energy Corp.  
P.O. Box 2289  
South Bend, Indiana 46680

Re: 141-14580  
First Minor Source Modification to  
Pending Part 70 No.: TV141-6956-00033

Dear Mr. Hodgson:

New Energy Corp. applied for a Part 70 operating permit on October 18, 1996 for a stationary source that produces ethyl alcohol. An application to modify the source was received on June 22, 2001. Pursuant to 326 IAC 2-7-10.5(d) a minor source modification to the source is hereby approved as described in the attached Technical Support Document:

- (a) One (1) ethyl alcohol internal floating roof storage tank, identified as T-611 with a maximum capacity of 1,250,000 gallons.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

APD

cc: File - St. Joseph County  
U.S. EPA, Region V  
St. Joseph Local Agency  
St. Joseph County Health Department  
Air Compliance Section Inspector - Rick Reynolds  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Part 70 Permit TV141-6956-00033

**PART 70 MINOR SOURCE MODIFICATION  
OFFICE OF AIR QUALITY  
and ST. JOSEPH LOCAL AGENCY**

**New Energy Corp.  
3201 West Calvert Street  
South Bend, Indiana 46613**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No.: 141-14580-00033	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 10, 2001

## TABLE OF CONTENTS

### **A SOURCE SUMMARY**

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

### **B GENERAL CONSTRUCTION CONDITIONS**

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Effective Date of the Permit [IC13-15-5-3]
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

### **C GENERAL OPERATION CONDITIONS**

- C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
- C.2 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- C.3 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]
- C.4 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.5 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
- C.6 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.7 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.8 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

### **D.1 FACILITY OPERATION CONDITIONS - Ethyl alcohol internal floating roof storage tank**

- D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-2]
- D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.1.3 Record Keeping Requirements

### **Certification**

## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and St. Joseph Local Agency. The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary source that produces ethyl alcohol.

Responsible Official:	Nathan Kimpel
Source Address:	3201 West Calvert Street, South Bend, Indiana 46613
Mailing Address:	P. O. Box 2289, South Bend, Indiana 46680-2289
Phone Number:	(219) 233-3116
SIC Code:	2869
County Location:	St. Joseph County
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units:

- (a) One (1) ethyl alcohol internal floating roof storage tank, identified as T-611 with a maximum capacity of 1,250,000 gallons.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

The source Part 70 permit (TV141-6956-00033) is still pending for issuance.

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

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This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

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Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

## **SECTION C GENERAL OPERATION CONDITIONS**

### **C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### **C.2 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

St. Joseph Local Agency  
Room 914  
County-City Building  
South Bend, Indiana 46601

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.3 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

and

St. Joseph Local Agency  
Room 914  
County-City Building  
South Bend, Indiana 46601

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ and St. Joseph Local Agency within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and St. Joseph Local Agency if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.4 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

St. Joseph Local Agency  
Room 914  
County-City Building  
South Bend, Indiana 46601

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.5 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.6 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and St. Joseph Local Agency may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.



**C.7 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and St. Joseph Local Agency representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and St. Joseph Local Agency makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and St. Joseph Local Agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

**C.8 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

St. Joseph Local Agency  
Room 914  
County-City Building  
South Bend, Indiana 46601

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and St. Joseph Local Agency on or before the date it is due.
- (c) Unless otherwise specified in this approval, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) One (1) ethyl alcohol internal floating roof storage tank, identified as T-611 with a maximum capacity of 1,250,000 gallons.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6] [326 IAC 2-2]

The VOC emission from this internal floating roof storage tank, identified as T-611 is less than 25 tons per year, threshold for the applicability of 326 IAC 8-1-6, and less than 40 tons per year, the threshold for PSD significant modification. Therefore, tank T-611 is not subject to 326 IAC 8-1-6 and 326 IAC 2-2 (Prevention of Significant Deterioration).

### Compliance Determination Requirements

#### D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required by this permit to perform compliance tests. However, the Commissioner reserves the right to invoke its authority under 326 IAC 2-1.1-11 to require stack testing, at any time to assure compliance with all applicable requirements.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.3 Record Keeping Requirements

Pursuant to Part 60.116b(b), (c) and (d) Monitoring of operations, the owner or operator of the proposed internal floating roof storage tank, identified as T-611 with a capacity of 1,250,000 gallons which will store ethyl alcohol with a vapor pressure of 4.2 Kilo Pascal (kPa) shall:

- (a) Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the storage tank T-611.
- (b) Maintained a record of the volatile organic liquid (VOL) stored, the period of storage and the maximum true vapor pressure of the VOL during the respective storage period.
- (c) Notify the IDEM, OAQ within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure value for each volume range.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: New Energy Corp.  
Source Address: 3201 West Calvert Street, South Bend, Indiana 46613  
Mailing Address: P. O. Box 2289, South Bend, Indiana 46680-2289  
Operation Permit No.: T141-6956-00033 (Pending)  
1<sup>st</sup> Minor Source Modification No.: 141-14580

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_



**Indiana Department of Environmental Management  
Office of Air Quality  
and St. Joseph Local Agency**

**Technical Support Document (TSD) for a Part 70 Minor Source  
Modification**

**Source Background and Description**

Source Name:	New Energy Corp.	
Source Location:	3201 West Calvert Street, South Bend, Indiana 46613	
SIC Code:	2869	
Operation Permit No.:	T141-6956-00033	Issuance Date: Pending
Minor Source Modification No.:	141-14580	
Permit Reviewer:	Aida De Guzman	

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from New Energy Corp. relating to the construction and operation of the following equipment:

- (a) One (1) ethyl alcohol internal floating roof storage tank, identified as T-611 with a maximum capacity of 1,250,000 gallons.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on June 22, 2001.

**Emission Calculations**

- (a) Ethyl Alcohol Internal Floating Roof Storage Tank: See Tanks 4.0 for detailed emission calculations.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO <sub>2</sub>	0.0
VOC	0.23
CO	0.0
NO <sub>x</sub>	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

### Justification for the Level of Approval

The source Part 70 Permit TV141-6956-00033 is still pending for issuance.

The proposed internal floating roof storage tank, identified as T-611 is subject to 326 IAC 2-7-10.5(d)(6), Minor Source Modification "a modification that is subject to a reasonably available control technology (RACT), a new source performance standard (NSPS), or national emission standard for hazardous air pollutants (NESHAP) and the RACT, NSPS, or NESHAP is the most stringent applicable requirement, except for those modifications that would be subject to the provisions of 40 CFR 63, Subpart B (61 FR 68384) December 27, 1996, Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources. As part of the application required under subsection (b), the applicant shall acknowledge the requirement to comply with the RACT, NSPS or NESHAP".

### Source Status

Existing Source PSD Definition (emissions after controls and limited emissions):

Below table reflects the source wide actual emissions for the year 1999, as reported in the OAQ Emissions Inventory:

Pollutant	Potential To Emit (tons/year)
PM-10/PM	53
SO <sub>2</sub>	1,014
NO <sub>x</sub>	763
VOC	958
CO	31

- (a) The source is an existing major source, since one of the pollutant is emitted at a rate of 100 tons per year and the source **is a chemical process plant** which is one of the listed sources under 326 IAC 2-2.

### Potential to Emit After Modification

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs

Ethyl alcohol storage tank	0.0	0.0	0.0	0.23	0.0	0.0	0.0
Total Emissions	0.0	0.0	0.0	0.23	0.0	0.0	0.0

- (a) This modification to an existing major stationary source is not major because VOC emissions increase is less than the PSD threshold level of 40 tons per year. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) St. Joseph County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) New Source Performance Standards:
- (1) 40 CFR Part 60.110b, Subpart Kb - Standards of Performance for Volatile



Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which construction, reconstruction, or modification commenced after July 23, 1984.

Pursuant to Part 60.116b(b), (c) and (d) Monitoring of operations, the owner or operator of the proposed internal floating roof storage tank, identified as T-611 with a capacity of 1,250,000 gallons which will store ethyl alcohol with a vapor pressure of 4.2 Kilo Pascal (kPa) shall:

- (i) Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the storage tank T-611.
  - (ii) Maintained a record of the volatile organic liquid (VOL) stored, the period of storage and the maximum true vapor pressure of the VOL during the respective storage period.
  - (iii) Notify the IDEM, OAQ within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure value for each volume range.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):  
There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

#### **State Rule Applicability -**

- (a) 326 IAC 2-6 (Emission Reporting)  
The proposed 1,250,000 gallons internal floating roof storage tank, identified as T-611, located in St. Joseph County is not by itself subject to 326 IAC 2-6, because it does not emit 10 tons of VOC. However, since sourcewide emission of VOC is greater than 10 tons per year, the source is subject to 326 IAC 2-6.
- (b) 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)  
This rule is not applicable to the proposed 1,250,000 gallons internal floating roof storage tank, identified as T-611, because this rule is only applicable to sources located in Clark, Floyd, Lake and Porter Counties.
- (c) 326 IAC 8-4 (Storage tanks)  
This rule is not applicable to the proposed 1,250,000 gallons internal floating roof storage tank, because it will not store petroleum products.
- (c) 326 IAC 8 (Volatile Organic Sources)  
There are no rules in article 326 IAC 8 that applies to the proposed internal floating roof storage tank, identified as T-611.

#### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate

compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Although the source Title V permit has not been issued, the source is considered subject to the Part 70 requirements under a permit shield. Thus, a determination has to be made as to whether or not compliance monitoring is required of the proposed modification.

Pursuant to the compliance monitoring guide "Title V Air Permit Compliance Monitoring Facts", issued on May 14, 1996, compliance monitoring is required if the proposed modification consists of units that emit particulate matter (PM), sulfur dioxide (SO<sub>2</sub>), and/or volatile organic compounds (VOC), and if the modification consists of any unit that:

- (a) is subject to a NSPS or NESHAP standard, or
- (b) has a control device and the allowable emissions of the controlled pollutant exceeds 10 pounds per hour, or
- (c) does not utilize emission controls and has actual emissions exceeding 25 tons/yr, or
- (d) would have been subject to an applicable requirement but for conditions limiting its potential to emit.

The proposed 1,250,000 gallons internal floating roof storage tank, identified as T-611 is subject to Part 60.116b Monitoring of Operations under the NSPS, 40 CFR Part 60.110b, Subpart Kb which requires that the owner or operator shall:

- (1) Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the storage tank T-611.
- (2) Maintained a record of the volatile organic liquid (VOL) stored, the period of storage and the maximum true vapor pressure of the VOL during the respective storage period.
- (3) Notify the IDEM, OAQ within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure value for each volume range.

## Conclusion

The operation of this internal floating roof storage tank, identified as T-611 shall be subject to the conditions of the attached **Minor Source Modification 141-14580-00033**.